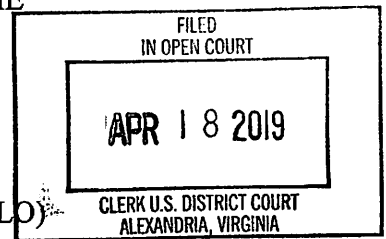


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	No. 1:19-cr-57 (LO)
)	
v.)	Count 1
)	Conspiracy to distribute
PETER LE)	cocaine, marijuana, et al.,
(Counts 1, 4, 5, 6, 7))	21 U.S.C. § 846
)	
DANE NICHOLAS HUGHES)	Counts 2, 3, 4, 5, and 6
(Counts 1, 2, 3))	Maintaining drug-
)	involved premises,
ANTHONY NGUYEN THANH LE)	21 U.S.C. § 856
(Count 1))	
)	Count 7
ANGEL HOANG LE)	Use, carry, and possess
(Counts 1, 4, 5, 6))	a firearm during drug
)	trafficking
JOSEPH DUK-HYUN LAMBORN)	18 U.S.C. § 924(c)
(Counts 1, 7))	
)	Forfeiture
Defendants.)	

April 2019 Term - At Alexandria

SECOND SUPERSEDING INDICTMENT

Count 1

THE GRAND JURY CHARGES THAT:

Conspiracy to Distribute Cocaine and Marijuana

Beginning in or about 2015, and continuing thereafter up to and including in or about March 2019, the exact dates being unknown to the grand jury, in the Eastern District of Virginia and elsewhere, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), DANE NICHOLAS HUGHES (a/k/a Dream), ANTHONY NGUYEN THANH LE (a/k/a Ant), ANGEL HOANG LE, and

JOSEPH DUK-HYUN LAMBORN (a/k/a Trigga), did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and with other persons, both known and unknown to the grand jury, to commit the following offenses:

(1) to unlawfully, knowingly, and intentionally distribute a mixture and substance containing of a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

(2) to unlawfully, knowingly, and intentionally distribute one hundred kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

(3) to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of tetrahydrocannabinol (THC), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

(4) to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of alprazolam (Xanax), a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

(5) to unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using controlled substances, in violation of Title 21, United States Code, Section 856;

(6) to unlawfully, knowingly, and intentionally distribute controlled substances to persons under the age of twenty-one, in violation of Title 21, United States Code, Section 859;

(7) to unlawfully, knowingly, and intentionally distribute controlled substances within 1000 feet of a public school, in violation of Title 21, United States Code, Section 860;

(8) to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to violate the provisions of Title 21 of the United States Code, including Title 21, United States Code, Sections 841, 856, 859, and 860; and to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to assist in avoiding detection for any such offense, all in violation of Title 21, United States Code, Section 861; and

(9) to unlawfully, knowingly, and intentionally sell drug paraphernalia and to use the mails and other facilities of interstate commerce to transport drug paraphernalia, that is, devices for use in compounding, converting, concealing, producing, processing, preparing, ingesting, inhaling, or otherwise introducing into the human body unlawful controlled substances, including THC and marijuana and products derived from marijuana, in violation of Title 21, United States Code, Section 863.

All in violation of Title 21, United States Code, Section 846.

Count 2

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

From in or about February 2018, and continuing until in or about September 2018, in Fairfax Station, Virginia, in the Eastern District of Virginia, the defendant, DANE NICHOLAS HUGHES (a/k/a Dream), did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

All in violation of Title 21, United States Code, Section 856.

Count 3

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

From in or about September 2018, and continuing until in or about February 2019, in Richmond, Virginia, in the Eastern District of Virginia, the defendant, DANE NICHOLAS HUGHES (a/k/a Dream), did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

All in violation of Title 21, United States Code, Section 856.

Count 4

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

From in or about November 2017, and continuing until in or about September 2018, in Merrifield, Virginia, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King) and ANGEL HOANG LE, did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

All in violation of Title 21, United States Code, Section 856.

Count 5

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

From in or about September 2018, and continuing until in or about March 2019, in Merrifield, Virginia, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King) and ANGEL HOANG LE, did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

All in violation of Title 21, United States Code, Section 856.

Count 6

Maintaining Drug-Involved Premises

THE GRAND JURY FURTHER CHARGES THAT:

From in or about March 2017, and continuing until in or about January 2018, in Lorton, Virginia, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King) and ANGEL HOANG LE, did unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using marijuana, THC, and other controlled substances.

All in violation of Title 21, United States Code, Section 856.

Count 7

Use, Carry, and Possess a Firearm during Drug Trafficking

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 31, 2019, and continuing to on or about February 1, 2019, in the Eastern District of Virginia, the defendants, PETER LE (a/k/a Savage, Loki, and Lorton King) and JOSEPH DUK-HYUN LAMBORN (a/k/a Trigga), did unlawfully and knowingly use and carry a firearm during and in relation to a drug trafficking crime, and did unlawfully and knowingly possess a firearm in furtherance of that drug trafficking crime, that is, the conspiracy to distribute cocaine, marijuana, THC, and alprazolam, as set forth and charged in Count 1 of this Second Superseding Indictment, which is re-alleged and incorporated herein by reference.

All in violation of Title 18, United States Code, Section 924(c).

Forfeiture

THE GRAND JURY FURTHER CHARGES THAT:

The defendants, PETER LE (a/k/a Savage, Loki, and Lorton King), DANE NICHOLAS HUGHES (a/k/a Dream), ANTHONY NGUYEN THANH LE (a/k/a Ant), ANGEL HOANG LE, and JOSEPH DUK-HYUN LAMBORN (a/k/a Trigga), if convicted of the offense charged in Count 1 of this indictment, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation and any of the defendant's property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

Pursuant to Title 21, United States Code, Section 853(a).

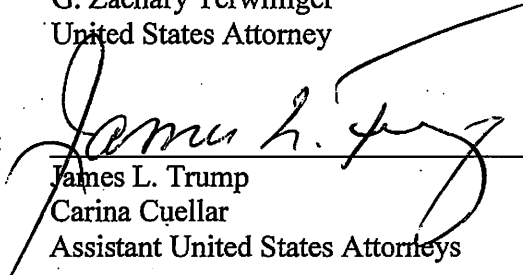
A TRUE BILL:

**Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office**

FOREPERSON

G. Zachary Terwilliger
United States Attorney

By:


James L. Trump
Carina Cuellar
Assistant United States Attorneys

Lynda Lao
Special Assistant United States Attorney